

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

In re: § CASE NO. 10-40052
§
VAN HUNTER DEVELOPMENT, LTD § Chapter 11
§
Debtor. §
§

UNOPPOSED MOTION TO EXTEND CASE RESOLUTION DEADLINES

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SCHEDULE A HEARING UNLESS IT DETERMINES THAT AN EVIDENTIARY HEARING IS NOT REQUIRED AND THAT THE COURT'S DECISION WOULD NOT BE SIGNIFICANTLY AIDED BY ORAL ARGUMENT. IF YOU FAIL TO APPEAR AT ANY SCHEDULED HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Van Hunter Development, Ltd (“Debtor” and/or “Van Hunter”) files this, its Unopposed Motion to Extend Case Resolution Deadlines and would respectfully show the Court as follows:

1. On January 4, 2010 (the “Petition Date”), the Debtor filed its voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code. The Debtor commenced his chapter 11 case on short notice due to a pending foreclosure.
2. The Debtor is a limited partnership which owns various lots in the exclusive Chateau du Lac subdivision in Flower Mound, Texas (collectively, the “Property”). The Debtor

continues to manage its affairs as a debtor-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No creditors' committee, trustee, or examiner has been appointed in this case.

3. Van Hunter has two major creditors which are Frost National Bank and Compass Bank. The principal of Van Hunter, who is a guarantor on those two loans, is diligently attempting to work out arrangements to provide for a resolution of those claims and is hopeful that an agreed resolution will occur within two weeks. Should these two claims be resolved, the Chapter 11 will be well on the way to a successful conclusion. Accordingly, Van Hunter prays that the Court extend the deadline for Van Hunter to file its Plan and Disclosure Statement to May 13, 2011 and to have confirmed a Plan of Reorganization by August 11, 2011. The U.S. Trustee does not oppose this request.

WHEREFORE, PREMISES CONSIDERED, Van Hunter prays that the Court extend the deadline for it to file its Plan and Disclosure Statement up to and including May 13, 2011 and the deadline for it to have confirmed a Plan of Reorganization up to and including August 11, 2011 and for such other and further relief as it may show itself justly entitled.

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/Larry A. Levick
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ATTORNEYS FOR DEBTOR
VAN HUNTER DEVELOPMENT, LTD.

CERTIFICATE OF CONFERENCE

I hereby certify that I spoke with the U.S. Trustee and he does not oppose the relief requested.

/s/Larry A. Levick
Larry A. Levick

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document will be served upon all parties registered or otherwise entitled to receive notice via ECF notification and a true and correct copy of the foregoing document will be served upon all parties on the attached service list via first class mail, postage prepaid on this 28th day of April 2011.

/s/Larry A. Levick
Larry A. Levick

Label Matrix for local noticing
0540-4
Case 10-40052
Eastern District of Texas
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Thu Apr 28 16:57:11 CDT 2011

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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